

Union Electric

One Ameren Plaza  
1901 Chouteau Avenue  
PO Box 66149  
St. Louis, MO 63166-6149  
314.621.3222

175

March 10, 2000

00 MAR 17 12:52

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

DOCKET NUMBER  
PETITION RULE PRM 26-2  
(64FR67202)

Attention: Rulemakings and Adjudications Staff

ULNRC-04202



**DOCKET NUMBER 50-483  
CALLAWAY PLANT  
UNION ELECTRIC COMPANY  
COMMENTS ON PETITION  
FOR RULEMAKING TO ADDRESS FATIGUE**  
Reference: 64 Federal Register 230, December 1, 1999

AmerenUE is providing written comments on the above referenced petition for rulemaking to address fatigue. AmerenUE supports the position endorsed by the Nuclear Energy Institute and provides the following comments.

AmerenUE has developed internal procedures and processes to control and limit working hours in accordance with the guidelines specified in Generic Letter 82-12. AmerenUE believes the limitations and guidelines provided in Generic Letter 82-12 are sufficient to ensure no undue risk to operator fatigue. Furthermore, the proposed rule contains limitations which would be resource intensive to monitor and enforce with little or no real benefit. Therefore AmerenUE does not believe further rulemaking to address this issue is warranted or necessary.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alan C. Passwater".

Alan C. Passwater  
Manager, Corporate Nuclear Services

DJW/jdg

cc: Mr. David Desaulniers, Project Manager, NRC  
Mr. Jim Davis, NEI